

# **EXHIBIT 16**

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Case No. 1:19-cv-2987

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YELENA RUDERMAN,

Plaintiff,

-against-

LAW OFFICE OF YURIY PRAKHIN, P.C. and  
YURIY PRAKHIN, in both his individual  
and professional capacities,

Defendants.

- - - - -x

December 8, 2020

10:08 a.m.

VIDEOCONFERENCE DEPOSITION of the  
Defendants in the above-entitled action,  
by ALEXANDER PUSACHEV, taken before Arthur  
Hecht, a Shorthand Reporter and Notary  
Public of the State of New York, pursuant  
to the Federal Rules of Civil Procedure,  
and stipulations between Counsel.

\* \* \*

1 Pusachev

2 ever use Dragon or a dictation device  
3 along the lines of what I described?

4 A. I don't remember installing such  
5 software for anybody, I don't remember.

6 Q. Have you ever heard of a  
7 computer program called JAWS, J-A-W-S?

8 A. No.

9 Q. No?

10 A. First time hearing.

11 Q. Yes. Did you ever communicate  
12 with Ms. Ruderman about installing any  
13 kind of computer program on her work  
14 computer?

15 A. No.

16 Q. Did you ever communicate with  
17 anybody at the firm about installing or  
18 potentially installing a computer program  
19 on Ms. Ruderman's computer?

20 A. I don't remember that.

21 Q. Did Irene Raskin ever ask you to  
22 increase the font size on Ms. Ruderman's  
23 computer?

24 A. I don't remember.

25 Q. Do you recall ever in fact

1 Pusachev

2 increasing the font size on Ms. Ruderman's  
3 computer?

4 A. I don't remember. I don't  
5 remember doing so, so.

6 Q. Did you ever -- so you have no  
7 recollection of increasing the font size  
8 on Ms. Ruderman's computer?

9 A. I don't recall it, no.

10 Q. Right. And you have no  
11 recollection of speaking to Ms. Raskin  
12 about increasing the font size on Ms.  
13 Ruderman's computer?

14 A. I don't remember.

15 Q. Did you ever communicate with  
16 Ms. Ruderman about a device called OrCam?

17 A. Can you repeat the device?

18 Q. Sure, it's OrCam, O-R-C-A-M.  
19 You've never heard of such a device?

20 A. No, first I'm hearing that.

21 Q. Have you ever heard of any kind  
22 of glasses that are specifically designed  
23 to assist the blind or people with severe  
24 vision impairments?

25 A. I don't recall it. Probably